

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Lion Air Flight JT 610 Crash	Consolidated Case No.: 1:18-cv-07686 Original Case No. 1:19-cv-02774 Honorable Thomas M. Durkin
--	---

AMENDED MOTION FOR LEAVE TO FILE PLAINTIFFS' FIRST

AMENDED COMPLAINT

Relief Requested

1. Plaintiffs, by and through the Herrmann Law Group, hereby request the Court for the entry of an Order for leave to file their First Amended Complaint, *attached as Exhibit A*.

Statement of Facts

2. This action results from the Lion Airlines JT 610 crash that occurred on October 29, 2018.

3. Herrmann Law Group filed on behalf of 24 victim families on April 24, 2019.

4. Herrmann Law Group has reached settlement with Boeing on 22 of the 24 original cases. **Two** of the cases remain unsettled.

5. Of the original 24 cases, 17 of the 22 settlements have been reviewed and approved by this court. Plaintiff's counsel will file the appropriate dismissal paperwork for the remaining **5** unapproved settlements.

6. Herrmann Law Group has reached a tentative settlement with Boeing for an additional **16** victim families. Per Boeing's request, Herrmann Law Group will file a new complaint in order to seek court approval for the settlements.

7. Herrmann Law Group represents an additional **2** victims' families that are unsettled and were not previously filed. These 2 families will be added into the amended complaint to be filed in this case number 1:19-cv-02774.

8. Boeing has requested, and these plaintiffs agree, that all settled cases be named in a new lawsuit in order to secure approval of all minors' claims and to secure court ordered dismissals with prejudice on all claims.

9. However, Boeing has agreed to file a written consent to the filing of this revised First Amended Complaint. A copy of their written consent shall be filed shortly.

Law

10. F.R.C.P. (a)(2) states that "In all other cases, a party may amend its pleading only with the opposing party's written consent *or the court's leave*. The court should freely give leave when justice so requires." The parties are diligently working towards resolution of the remaining cases. An amended complaint will help to effectuate the resolution of remaining victims' families

as Court approval of minor settlements is required, and to retain jurisdiction over any disputes in the settlement process.

Conclusion

11. Plaintiffs' should be granted leave to file their First Amended Complaint.

Dated this 13th day of March 2020.

Lead Trial Counsel:
HERRMANN LAW GROUP
Attorneys for Plaintiffs

Local Counsel:
CARMEN D. CARUSO LAW FIRM
Attorneys for Plaintiffs

/S/CHARLES J. HERRMANN
CHARLES HERRMANN (WA Bar #6173)
Email: charles@hlg.lawyer
MARK E. LINDQUIST (WA Bar #25076)
Email: mark@hlg.lawyer
ANTHONY MARSH (WA Bar #45194)
Email: anthony@hlg.lawyer
CRYSTAL LLOYD (WA Bar #46072)
Email: crystal@hlg.lawyer
505 5th Ave South, Ste. 330
Seattle, WA 98104
Voice: (206) 625-9104
Fax: (206) 682-6710

/S/ CARMEN D. CARUSO
Carmen D. Caruso (# 6189462)
77 W. Washington St., Ste. 1900
Chicago, Il. 60602
Email: cdc@cdcaruso.com
Voice: (312) 626-1160
Fax: (312) 276-8646